

COURT OF APPEALS  
DIVISION TWO  
OF THE STATE OF WASHINGTON

FILED  
COURT OF APPEALS  
DIVISION II

2021 JUN 30 PM 2:28

STATE OF WASHINGTON

Respondent,

v.

Donald Kingsley

(your name)

Appellant.

No. 54787-2 BY AR

STATEMENT OF ADDITIONAL  
GROUND FOR REVIEW

I, Donald Kingsley, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

Informant did more than just listen and report but affirmatively sought to endorse statements by means of coercion.

Additional Ground 2

Father and alleged victim's had been practicing what to say during pretrial/hearsay hearing. Prosecutor believes for witness. knew father & daughter rehearsed

If there are additional grounds, a brief summary is attached to this statement.

Date: 6/27/21

Signature: Donald Kingsley

P/M: 6/28/21

COURT OF APPEALS  
DIV. II OF THE  
STATE OF WASHINGTON

STATE OF WASH.  
Respondant

NO. 54787-2-II

SAG RAP 10.10

1) Donald Kingsley Appellant

Under state and federal law, an "informant" is only supposed to "listen and report" what is being said. In this case, the so called informant went further by pressing me aggressively ~~to seek~~ to induce ~~me~~ incriminating statements. ~~while~~

2) The alleged victim and her father had practiced what to testify to which had come to light during pretrial hearings. See RP 117; 118; 137; 138; 141. Further, the prosecutor became a witness for purposes of trial when she personally vouched for the alleged victim's statements.

3) The prosecutor was aware of the father and daughter/ alleged victim, rehearsing trial testimony but failed to do anything about it. Defense counsel did object to this, preserving the right to challenge this on direct appeal.